

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:) **Case No.** 18-20971-CMB
Linda C. Parker,)
) **Debtor,**)
Linda C. Parker,)
) **Movant,**)
 vs.)
No Respondent.) **Hearing Date:** 03/05/20 @ 1:30 p.m.
) **Response Due:** 02/24/20
) **Document No.**

DEBTOR'S MOTION FOR FINAL DECREE

AND NOW, comes the Debtor, Linda C. Parker, by and through her attorneys, Donald R. Calaiaro and Calaiaro Valencik, and presents the following:

1. This case was originally filed March 14, 2018.
2. The Debtor's Chapter 11 Plan dated December 19, 2018, was confirmed by Order dated September 11, 2019.
3. The Debtor has paid all outstanding quarterly fees and agrees to pay all fees accrued prior to the entry of the final decree.
4. The Debtor's Plan has been substantially consummated within the meaning of 11 U.S.C. §1101(2):
 - A. The Debtor continues to be employed which will generate enough income to fund his Plan; and
 - B. The Debtor has commenced distributions to creditors under the Plan.
5. This estate is ready for the issuance of a final decree.
6. The motion for relief from stay filed by PNC Bank for the Debtor's residence has not been resolved. However, it may be resolved prior to the hearing on the Motion for Final Decree.

7. There are no objections to claims pending.
8. There should be no further need for any Bankruptcy Court administration.

WHEREFORE, the Debtor requests that this Court enter an Order granting a final decree and closing the estate.

Respectfully submitted,

Date: February 7, 2020

BY: /s/ Donald R. Calaiaro
Donald R. Calaiaro, Esquire, PA I.D. #327538
dcalaiaro@c-vlaw.com

CALAIARO VALENCIK
938 Penn Avenue, Suite 501
Pittsburgh, PA 15222-3708
(412) 232-0930